

1 Amanda C. Yen (NSBN 9726)
2 Kristen T. Gallagher (NSBN 9561)
3 McDONALD CARANO LLP
4 2300 W. Sahara Ave, Suite 1200
5 Las Vegas, NV 89102
6 Telephone: 702.873.4100
7 ayen@mcdonaldcarano.com
8 kgallagher@mcdonaldcarano.com

9 David P. Shouvin
10 PORTER WRIGHT MORRIS & ARTHUR LLP
11 41 South High Street, Suite 2900
12 Columbus, OH 43215
13 Telephone: 614.227.2045
14 dshouvin@porterwright.com
15 (admitted *pro hac vice*)

16 *Attorneys for Konecranes Global Corporation*

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 KONECRANES GLOBAL CORPORATION,

20 Case No.: 2:18-cv-02015-GMN-NJK

21 Plaintiff,

22 **STIPULATION AND ORDER TO EXTEND
BRIEFING SCHEDULE RE:
DEFENDANT'S MOTION FOR
SANCTIONS PURSUANT TO RULE 11 OF
THE FEDERAL RULES OF CIVIL
PROCEDURE**

23 vs.

24 MODE TECH (Beijing) Co., Ltd.,

25 Defendant.

26 **(FIRST REQUEST)**

27 Plaintiff Konecranes Global Corporation (“Konecranes”) and defendant Mode Tech
28 (Beijing) Co., Ltd. (“Mode Tech”) hereby agree, stipulate and respectfully request that the
Court extend the deadline for Konecranes to respond to Mode Tech’s Motion for Sanctions
Pursuant to Rule 11 of the Federal Rules of Civil Procedure (the “Motion”) (ECF No. 50) from
May 9, 2019 to May 17, 2019. The parties further agree and respectfully request that the Court
extend the time for Mode Tech to file a reply in support of its Motion from May 16, 2019 to
May 31, 2019. This is the parties’ first request to extend the deadline.

Both parties request additional time to prepare their respective response and reply briefs
in order to have sufficient time to communicate with their respective clients which are both

1 located overseas. The undersigned request this represent that this stipulation is not designed for
2 purposes of delay. For this reason, the parties respectfully request that the Court grant the
3 requested extension.

4 DATED this 1st day of May, 2019.

5 McDONALD CARANO LLP

6 By: /s/ Kristen T. Gallagher
7 Amanda C. Yen (NSBN 9726)
Kristen T. Gallagher (NSBN 9561)
8 2300 W. Sahara Avenue, Suite 1200
Las Vegas, NV 89102
Telephone: 702.873.4100

9
10 David P. Shouvin
PORTER WRIGHT MORRIS &
ARTHUR LLP
11 41 South High Street, Suite 2900
Columbus, OH 43215
Telephone: 614.227.2045
dshouvin@porterwright.com
(admitted *pro hac vice*)

12
13 Attorneys for Konecranes Global
Corporation

BUETHER JOE & CARPENTER, LLC

By: /s/ Christopher M. Joe
Christopher M. Joe
Kenneth P. Kula
Brian A. Carpenter
1700 Pacific, Suite 4750
Dallas, TX 75201
Tel: (214) 466-1272
chris.joe@bjciplaw.com
ken.kula@bjciplaw.com
brian.carpenter@bjciplaw.com
(admitted *pro hac vice*)

Daniel T. Foley, Esq.
Nevada Bar No. 1078
FOLEY & OAKES, PC
1210 S. Valley View Blvd. #208
Las Vegas, NV 89102
Tel.: (702) 384-2070
dan@foleyoakes.com

Attorneys for Defendant Mode Tech
(Beijing) Co., Ltd.

18 **ORDER**

19
20 **IT IS SO ORDERED.**

21
22 DATED this 7 day of May, 2019.

23
24
25
26
27
28

Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT